

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

TELEPHONE SCIENCE CORPORATION,

Plaintiff,

v.

**JACK PIZZO, 2 BROTHERS WORLDWIDE
PUBLISHING LLC, VOICE BROADCASTING
CORPORATION, JEFF FOURNIER, BUMP &
GRIND INC., BLUE HOUSE, INC., AND JUSTIN
GRELLA,**

Defendants.

CIVIL ACTION: 2:15-CV-01702

**DEFENDANTS VOICE BROADCASTING CORPORATION AND
JEFF FOURNIER'S NOTICE OF AMENDED MOTION TO DISMISS
PLAINTIFF'S SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT Defendants Voice Broadcasting Corporation and Jeff Fournier ("Defendants"), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and upon the accompanying Amended Memorandum of Law in Support of Defendants' Amended Motion to Dismiss, will move this Court before the Honorable Leonard D. Wexler, United States District Judge, Eastern District of New York, 944 Federal Plaza, Central Islip, New York 11722, on a day and time to be determined by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all claims in the Second Amended Complaint against Defendants with prejudice for failure to state a claim upon which relief may be granted.

Dated: January 26, 2016

MORGAN, LEWIS & BOCKIUS LLP

/s/ Gregory T. Parks

Gregory T. Parks (admitted *pro hac vice*)

Ezra D. Church (admitted *pro hac vice*)

1701 Market Street

Philadelphia, PA 19103-2921

215.963.5000

gparks@morganlewis.com
echurch@morganlewis.com

Stephanie Gamiz
101 Park Avenue
New York, New York 10178
212.309.6000
sgamiz@morganlewis.com

*Attorneys for Defendants Voice
Broadcasting Corporation and Jeff Fournier*